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December 2, 2020

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Hapag-Lloyd Aktiengesellschaft v. O'Rourke Marine Servs. L.P. et al.,
No. 14 Civ. 10027 (VEC)

Canpotex Shipping Servs. Ltd. et al. v. OW Bunkers (UK) Ltd., et al.,
No. 15 Civ. 1351 (VEC)

Dear Judge Caproni:

We write on behalf of ING Bank N.V., as Security Agent, together with counsel for the parties to the cases listed above, further to the Court's November 2, 2020 order to provide a further update on these matters.

The parties to both matters are pleased to report that they have reached agreements in principle to settle their respective cases. The parties are in the process of exchanging draft agreements to finalize the terms of their arrangements.

In view of the foregoing, the parties respectfully request a further 28 days, until December 30, 2020, to report back to the Court with a status update.

Respectfully submitted,



Bruce G. Paulsen